IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Patent Application of: Christopher D. Hancock	Confirmation No.: 1738
Application No.: 09/883,751	Art Unit: 2178
Filed: June 18, 2001	Examiner: J. D. Campbell
For: SYSTEM AND METHOD FOR MANAGING WEB PAGE MEDIA	

AMENDED APPEAL BRIEF

MS Appeal Brief - Patents
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

Sir:

As required under 37 C.F.R. § 41.37(a), this brief is in furtherance of the Notice of Appeal in this application filed on May 1, 2006. The fees required under 37 C.F.R. § 41.20(b)(2), and any required petition for extension of time for filing this brief and fees therefor, are dealt with in the accompanying TRANSMITTAL OF APPEAL BRIEF.

This brief contains items under the following headings as required by 37 C.F.R. § 41.37. The complete Table of Contents follows.

CONTENTS

I.   REAL PARTY IN INTEREST

The real party in interest for this appeal is Microsoft Corporation of Redmond, Washington.

II.   RELATED APPEALS, INTERFERENCES, AND JUDICIAL PROCEEDINGS

Appellant and appellant's legal representative are unaware of any prior or pending appeal, interference, or judicial proceeding which may be related to, directly affect or be directly affected by, or have a bearing on the Board's decision in this pending appeal.

III.   STATUS OF THE CLAIMS

Claims 22-36 are pending in this application. Claims 1-21 are canceled. Claims 22-36 are rejected under 35 U.S.C. § 103(e) as being unpatentable over King[1] and Estrada.[2] Appellant appeals the rejection of claims 22-36.

IV.   STATUS OF AMENDMENTS

Appellant has filed no amendments subsequent to the final rejection.

V.   SUMMARY OF THE CLAIMED SUBJECT MATTER

A.   Overview of the Invention and Prior Art

1.   The Invention

A problem with prior techniques for web page design is that it is difficult for writers and artists of web pages to effectively coordinate the locating or creating of media elements (e.g., graphical images) that are needed for each web page. A writer writes the text for a web page and writes specifications ("specs") that describe and identify what media element is needed at what location within a web page. An artist at a later time can review the specifications, locate or create the specified media, and insert the media into the web page. Because of the large size of web site development projects, which can

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[1]   U.S. Patent No. 6,161,114.
[2]   U.S. Patent No. 6,732,148.

include many web pages with numerous media elements and numerous specifications, it can become difficult or confusing to identify and retrieve the correct media elements.

Appellant's invention is directed to a system for managing media that overcomes some of the problems of prior techniques. Appellant's system provides a collection of specs for existing media elements that can be used by writers when creating web pages. This collection may be created initially by an administrator or developed over time as writers and artists create or modify web pages. A writer creating a web page can use appellant's system to display the specs for existing media elements so that the writer can locate a desired media element if it already exists. If the writer can locate a desired media element based on review of the specs, then an identifier (e.g., URL) for that media element is inserted into the web page. If, however, the writer cannot locate the desired media element, the writer can use appellant's system to create a new spec that describes the desired media element and to store the new spec in association with the web page. The spec is stored in association with the web page so that an artist can subsequently retrieve and use the spec to create the desired media element for the web page. After the artist has created the desired media element based on the spec, then an identifier for the created media element is inserted into the web page.

Appellant's system also provides various other improvements to increase the efficiency of designing web pages. For example, appellant's system allows a writer to attach a screen shot of the desired media element to a spec, which can help ensure that the artist locates the correct media element. As another example, appellant's system generates reports of unfulfilled specs. Artists can use these reports to coordinate and prioritize their efforts in filling the specs. As another example, appellant's system notifies the writer of a spec when the desired media element has been created by an artist. These notifications allow the writer to track progress in completing a project.

2.　The King Reference

King describes a technique for the automatic and dynamic composition and re-composition of documents, such as a web page. King's technique automatically performs

document layout, styling, and fit of the content (e.g., text and images) of the document to a selected design (e.g., a newsletter layout) for a selected media (e.g., display device). To facilitate the dynamic composition, King separates the information of a document into content elements, a design description, and a media specification. (King, 2:52-55 and 5:55-58.)

King defines content elements, design description, and media specification as follows: Content elements are the content of a document and can include text, images, graphics, and so on. (King, 7:30-35.) A design description describes the overall layout of the document and can include a horizontal brochure format, a single or multi-page format, a newsletter, a calendar, or so on. (King, 7:36-49.) A media specification specifies the media to which a composition is to be rendered and can include a sequence of screen pages, a web site in HTML, a three-dimensional HTML format, paper pages, and so on. (King, 7:50-64.)

To compose a document for rendering, King's technique via a design engine inputs the content elements, the design description, and the media specification of the document and renders the content to the specified medium in accordance with the design description. (King, 8:47-50.)

3. The Estrada Reference

Estrada describes automating a manual technique for generating a localized graphic. According to this manual technique, a graphic artist receives a graphics specification and uses a graphics tool to generate the graphic localized for a country. (Estrada, 4:21-32.) Since this manual process is time-consuming, Estrada describes an automated way of generating such graphics for different countries. Estrada describes that a graphics server automatically generates a localized graphic when it receives a request for a graphic. The graphics server identifies from the request parameters for the localization and dynamically generates the localized graphic based on the parameters. (Estrada, 22:34-65.)

B.   Independent Claims

The rejected independent claims are directed to a technique for creating a web page.

1.   Claim 22

Claim 22 is directed to a method in a media managing software module executing on a computer system for creating a web page. (Specification, 2:26-27.) The software module provides existing specs that describe media elements and displays them to a writer. (Specification, 10:3-11.) When the writer locates a desired media element from the specs, the software module inserts an identifier of the media element into the web page. (Specification, 10:11-14.) When the writer does not locate the desired media element based upon review of the existing specs, the software module creates a spec describing the desired media element as indicated by the writer. (Specification, 10:13-15.) The software module stores the created spec in association with the web page so that an artist can subsequently retrieve and use the spec to create the desired media element for the web page. (Specification, 10:17-19.) After the artist has created the desired media element, the software module inserts a unique identifier for the created media element into the web page. (Specification, 10:20-28.)

2.   Claim 28

Claim 28 is directed to a computer-readable medium containing instructions for controlling a computer system to create a web page. (Specification, 2:26-27.) The instructions display to a writer existing specs for media elements so that the writer can locate a desired media element to add to the web page. (Specification, 10:8-15.) When the writer locates a desired media element, the instructions insert a unique identifier for the located media element into the web page. (Specification, 10:11-14.) When the writer does not locate a desired media element, the instructions create a spec describing the desired media element and storing the created spec in association with the web page so the artist can subsequently retrieve and use the spec to create the desired media element for the web page. (Specification, 10:13-19.) After the artist has created the desired media

element, the instructions insert a unique identifier for the created media element into the web page. (Specification, 10:20-28.)

3.   Claim 36

Claim 36 is directed to a computer system for creating a web page. (Specification, 2:26-27.) The computer system includes a component that provides existing specs for media elements so that a writer can locate a desired media element to add to the web page. (Specification, 10:3-11.) The computer system includes a component that inserts a unique identifier for the located media element into the web page when the writer locates a desired element. (Specification, 10:11-14.) The computer system provides a component that, when the writer does not locate a desired media element, creates a spec describing the desired media element that includes a screen shot and storing the created spec in association with a web page. (Specification, 10:13-19.) The computer system provides a component that generates a report of unfilled specs for which an artist has not created the desired media element so that the artist can retrieve and use the spec to create the desired media element for the web page. (Specification, 3:1-10.) The computer system provides a component that notifies the writer when the desired media element has been created. (Specification, 3:1-10.) The computer system also provides a component that inserts a unique identifier for the created media element into the web page when requested by the user. (Specification, 3:1-10.)

VI.   GROUNDS OF REJECTION TO BE REVIEWED

A.   The Examiner's Rejections

The Examiner has rejected all the pending claims under 35 U.S.C. § 103(a) as being unpatentable over King in view of Estrada.

It is the Examiner's position that "King discloses a method in which media elements have existing specs which are displayed to web writers so they can locate a desired media." (Office Action, Nov. 29, 2005, p. 2.) The Examiner believes that King's "content element" corresponds to the claimed "media element" and that King's "design description" corresponds to the claimed "spec." (*Id.* at p. 6.) The Examiner further states "that content

elements have a design description that a user can view to determine which content is wanted, and the design description may be changed accordingly (creating a new spec) to generate a [sic] different content elements." (*Id.*) The Examiner believes that "design descriptions correspond [sic, to] the very broadly defined term 'spec' in the applicant's claim." (*Id.*)

B.   Issues

1.   Whether King's design description is "a spec describing the desired media element as indicated by the writer."

2.   Assuming, *arguendo*, that a design description is a "spec," whether King displays to a writer existing design descriptions for content elements so that the writer can locate a desired content element.

3.   Assuming, *arguendo*, that a design description is a "spec," whether King describes attaching a screen shot of a content element to a design description.

4.   Assuming, *arguendo*, that a design description is a "spec," whether Estrada describes generating a report of unfulfilled design descriptions.

5.   Assuming, *arguendo*, that a design description is a "spec," whether King describes notifying the writer of a design description when a content element has been created by an artist.

6.   Whether "accelerated productivity in creation and maintenance of collaborative content" is sufficient motivation for combining King and Estrada when the Examiner points to nothing in the prior art that suggests this advantage of the combination.

VII.   ARGUMENTS

    A.   Legal Standards for Obviousness

All the claims stand rejected as obvious under 35 U.S.C. § 103(a), which provides:

> A patent may not be obtained though the invention is not identically disclosed or described as set forth in section 102 of this title, if the differences between the subject matter sought to be patented and the prior art are such that the subject matter as a whole would have been obvious at the time the invention was made to a person having ordinary skill in the art to which said subject matter pertains. Patentability shall not be negatived by the manner in which the invention was made.

"[T]he [E]xaminer bears the initial burden of presenting a *prima facie* case of obviousness." *In re Rijckaert*, 9 F.3d 1531, 1532, 28 U.S.P.Q.2d (BNA) 1955, 1956 (Fed. Cir. 1993). "'A *prima facie* case of obviousness is established when the teachings from the prior art itself would appear to have suggested the claimed subject matter to a person of ordinary skill in the art.'" *Id.* (quoting *In re Bell*, 991 F.2d 781, 783, 26 U.S.P.Q.2d (BNA) 1529, 1531 (Fed. Cir. 1993)).

To establish a *prima facie* case of obviousness, the Examiner must (1) identify prior art references that disclose all the elements of the claims, and (2) provide a suggestion or motivation to modify the references to produce the claimed invention. MPEP § 2143. With respect to the second requirement, the Examiner must provide a suggestion or motivation to combine from within the prior art, and may not rely upon hindsight gleaned from appellant's invention itself. *See, e.g., Uniroyal, Inc. v. Rudkin-Wiley Corp.*, 837 F.2d 1044, 1050-51, 5 U.S.P.Q.2d (BNA) 1434, 1438 (Fed. Cir. 1988).

Under these standards, appellant's invention would not have been obvious.[3] The Examiner has not identified prior art references that disclose all the elements of the pending claims. The Examiner also has not provided sufficient motivation from within the

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[3]   It is the Examiner's position that "the applicant is responsible for all of the teachings of King when considering how the reference relates to possible patentability of the applicant's invention." (Office Action, Nov. 29, 2005, p. 6.) The Examiner is clearly attempting to shift his burden of establishing a *prima facie* case of obviousness to be appellant's burden of proving that the cited references do not disclose the claimed invention. This is clearly impermissible.

prior art to modify the cited references so as to produce the claimed invention. In addition, one skilled in the art would consider the many differences between the combination of King and Estrada and appellant's claimed invention to be not obvious.

B.   Analysis of Issues

1.   King's Design Description Is Not a "Spec"

A "spec" describes and identifies a media element that is to be included in a document at a certain point. Appellant's specification states that a writer "writes a specification ('spec') which describes and identifies what media is needed at that point in the document." (Specification, 2:6-8.) Moreover, all the claims recite "a spec describing the desired media element."

King's design description, which the Examiner believes corresponds to appellant's spec, describes a format for the overall layout of a web page.

> The design description specified by the user may also be of any kind. By way of example, the design specified by the user may be a custom design that the user has created through the use of the application program **12**, or the design may come from a design template that is stored in a design catalogue of the application program **12**. Many different types of designs are possible. By way of example, the user may specify a horizontal brochure format, a vertical brochure format, a single page or multi-page format, or other designs such as reports, newsletters, memos, home pages, white papers, schedules, programs, agendas, calendars, flyers, tables, catalogues, galleries, Web sites, maps, organizational charts, slides presentations, etc.

(King, 7:36-49.) King's design description thus may specify a calendar format, newsletter format, or other format. King renders content elements of a document in accordance with the design description.

King's design description describes a format for layout of content elements, but does not describe or identify a media element as does the claimed spec. It is the Examiner's position that King's "design descriptions correspond [sic, to] the very broadly defined term 'spec' in the applicant's claim." (Office Action, Nov. 29, 2005, p. 6.) Appellant does not understand what the Examiner means by a "very broadly defined term." The term

"spec" is very precisely defined in appellant's specification. A spec describes and identifies what media element is needed at what location within a web page. There is no reasonable interpretation of appellant's definition of "spec" that would encompass King's design description, which defines a layout of a document. One skilled in the art would consider appellant's system that uses specs describing media elements to be not obvious over King's system that uses design descriptions to render content. In addition, King's design description is not used "to create the desired media element for the web page" as recited by each of the claims; rather, it is used to define the layout for existing content elements. As one skilled in the art knows, defining a layout is different from describing or identifying media elements because a layout employs media elements, which in turn can be described or identified by a spec. Thus, a design description is not equivalent to a spec.

2.   King Does Not Display Design Descriptions So That a Writer Can
       Locate a Desired Content Element

Appellant is puzzled by the Examiner's position that King's existing design descriptions are displayed to writers so that they can locate content elements. Appellant can find nothing in King that describes displaying design descriptions to a writer.

The Examiner points to King at 7:17-99 as showing "a design description that a user can view to determine which content is wanted and the design description may be changed accordingly (creating a new spec) to generate a different content elements [sic]." (Office Action, Nov. 29, 2005, p. 6.) This section of King describes Figure 1, which is reproduced below. Figure 1 shows user interface 18 and 18'. User interface 18 displays a current content element 20 that is displayed according to the current design description. After a user specifies a new content element and a new design description, the old content element 20' and new content element 22 are displayed on user interface 18' in accordance with the new design description. Because the user changed the design description, the text indicated by the wavy lines appears below the image (e.g., circle).

FIG. 1
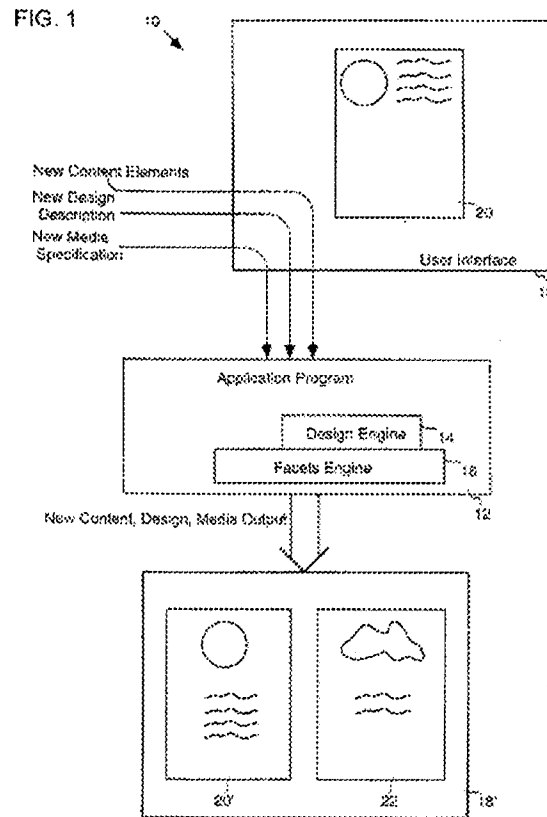
No design description is displayed in Figure 1 of King. Rather, content elements 20, 20', and 22 are displayed in accordance with the design descriptions. Although one may be able to infer the design description for the positioning of the content elements, a design description itself is not displayed. In addition, one skilled in the art would consider the differences between displaying a spec and displaying a content element based on a design description to be not obvious.

Moreover, there is nothing in King to suggest design descriptions can be used by an artist to locate existing content elements. Since a design description describes a layout, it is not clear how such a layout could help someone locate a desired content element.

3.   King Does Not Describe Attaching a Screen Shot of a Content
      Element to a Design Description

The Examiner points to King at 10:23-67 as showing "a screen shot of the element is attached to the spec." (Office Action, Nov. 29, 2005, p. 3.) Appellant can find nothing in

this section that mentions a screen shot (although it does mention a computer "screen"), let alone that a design description includes a screen shot as the claimed spec includes a screen shot as recited by several claims (e.g., claim 36). A design description is a format of a layout. Appellant does not know why one would attach a screen shot to a format of a layout. Appellant can find no suggestion in the cited portions, or any other portion, of King to do so.

4.　Estrada Does Not Generate a Report of Unfulfilled Design Descriptions

Recognizing that King does not suggest generating a report of unfulfilled specs as recited by several claims (e.g., claim 27), the Examiner points to Estrada at 4:5-40. The Examiner states that "Estrada discloses a method in which a report (written account presented in detail) of the spec that isn't fulfilled is presented to the artist so that the artist can complete the request (column 4, lines 5:40)." (Office Action, Nov. 29, 2005, p. 4.) Appellant can find nothing in the relied-upon portion or any other portion of Estrada that mentions a "written account." Estrada mentions "reports" only once in the background section at 2:30-44. It is not clear, however, what those reports contain or how they could possibly be related to King's design descriptions. More fundamentally, the Examiner has not explained what in King suggests an unfulfilled design description or even what is an unfulfilled design description. Design descriptions simply specify layouts. Appellant does not understand how a layout is unfulfilled.

5.　Estrada Does Not Describe Notifying a Writer of a Design Description When the Desired Media Element Has Been Created

Recognizing that King does not describe notifying a writer of a spec when a media element has been created as recited by claims 35 and 36, the Examiner relies on Estrada at 4:5-40. The Examiner states that "Estrada discloses a method in which the writer is notified when the artist completes the desired media (column 4, lines 5-40)." (Office Action, Nov. 29, 2005, p. 4.) The relied-upon portion of Estrada mentions that an artist generates a graphic as requested by a requester. This portion, however, does not suggest that the requester is notified when the graphic is created. Moreover, this portion

specifically mentions that the generating of the graphic "was done manually." Thus, there is nothing to suggest that a writer of a design description is notified when a content element is created. Moreover, the Examiner has not explained why a writer of a design description would need to or even want to know when a content element is created.

6.   The Examiner Has Not Provided a Sufficient Motivation to Combine King and Estrada and Thus Has Not Even Established a *Prima Facie* Case of Obviousness

The Examiner believes that it would have been obvious to combine King and Estrada because the combination would have resulted in "accelerated productivity." The Examiner, however, provides nothing in support of this conclusory statement. First, the Examiner points to nothing in King or Estrada that suggests that they should be combined and especially not in the manner suggested by the Examiner. Second, the Examiner points to nothing in King or Estrada to suggest that the combination would result in "accelerated productivity" or what that accelerated productivity would be. The Examiner is impermissibly using the advantages of appellant's invention that are clear from appellant's specification as the suggested advantage of the combination. Thus, the Examiner has not established a *prima facie* case of obviousness.

C.   Rejection of Claims 22-36 Under 35 U.S.C. § 103(a) Based on King and Estrada

1.   Claims 22, 24-26, 28-29, and 31-33

These claims recite "creating a spec describing the desired media element" and "displaying to a writer the existing specs." As discussed above in section VII.B.1, King's design description is not the same as the claim "spec." Moreover, as discussed above in section VII.B.2, even assuming King's design description was a spec, King neither teaches nor suggests that a design description is displayed. In addition, as discussed in section VII.B.6, the Examiner has not provided a sufficient motivation for combining King and Estrada. As such, these claims cannot be considered to be obvious based on the combined teachings of King and Estrada.

2.　Claims 23 and 30

These claims depend from claim 22 and 28, respectively, and are not obvious for the same reasons as those claims. In addition, these claims recite "attaching a screen shot of the desired media element to the spec." As discussed above in section VII.B.3, King does not mention a screen shot and does not suggest that a screen shot can be attached to or even why one would want to attach one to a design description. As such, these claims cannot be considered to be obvious in view of King and Estrada.

3.　Claims 27 and 34

These claims depend from claim 22 and 28, respectively, and are not obvious for the same reasons as those claims. In addition, these claims recite "generating a report of unfulfilled specs for which an artist has not created the desired media element." As discussed above in section VII.B.4, Estrada only mentions a report once and does not describe what is included in this report. Moreover, there is nothing in either King or Estrada to suggest that any reports are generated for King's design description or what is an "unfulfilled" design description. These claims thus cannot be considered obvious in view of King and Estrada.

4.　Claim 35

This claim depends from claim 28 and is not obvious for the same reason as claim 28. In addition, this claim recites "notifying the writer of a spec for which a desired media element has been created." As discussed above in section VII.B.5, Estrada does not describe notifying a requester when a graphic is created. Moreover, neither King nor Estrada suggests that a writer of a design description is notified when a content element is created. Thus, this claim cannot be considered obvious in view of King and Estrada.

5.　Claim 36

This claim recites a combination of elements that is neither taught nor suggested by King and Estrada. This claim recites the element of "creat[ing] a spec describing the desired media element" and "provides existing specs for media elements." As discussed above in section VII.B.1, King's design description is not the same as the claim "spec."

Moreover, as discussed above in section VII.B.2, even assuming King's design description was a spec, King neither teaches nor suggests that a design description is displayed. In addition, as discussed in section VII.B.6, the Examiner has not provided a sufficient motivation for combining King and Estrada.

This claim also recites the element of including "a screen shot" in the spec. As discussed above in section VII.B.3, King does not mention a screen shot and does not suggest that a screen shot can be included in or even why one would want to include one in a design description.

This claim recites the element of "generat[ing] a report of unfulfilled specs for which an artist has not created the desired media element." As discussed above in section VII.B.4, Estrada only mentions a report once and does not describe what is included in this report. Moreover, there is nothing in either King or Estrada to suggest that any reports are generated for King's design description or what is an "unfulfilled" design description.

This claim recites the element of notifying "the writer when the desired media element has been created." As discussed above in section VII.B.5, Estrada does not describe notifying a requester when a graphic is created. Moreover, neither King nor Estrada suggests that a writer of a design description is notified when a content element is created.

Because King and Estrada do not teach or suggest this combination of elements, this claim cannot be considered to be obvious.
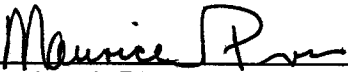
VIII.   CONCLUSION

The Examiner has not established even a *prima facie* case of obviousness because he has pointed to elements in King or Estrada that cannot be considered to correspond to several elements of the claims (e.g., a design description is not a spec) and has not provided sufficient motivation for combining the references. In addition, even if the Examiner was considered to have established a *prima facie* case, one skilled in the art would not consider the differences between the claimed invention and the combination of

King and Estrada to be obvious. For example, one would not consider a system that associates specs describing media elements with web pages to be obvious in view of a system that uses a design description to lay out content of a document. Appellant respectfully requests that the rejection of the claims be reversed.

Dated: September 15, 2006   Respectfully submitted,

By /signature/
Maurice J. Pirio
   Registration No.: 33,273
PERKINS COIE LLP
P.O. Box 1247
Seattle, Washington 98111-1247
(206) 359-8548
(206) 359-7198 (Fax)
Attorney for Appellant

APPENDIX A

CLAIMS

1-21.   (Cancelled)

22.   (Previously presented) A method in a media managing software module executing on a computer system for creating a web page, the method comprising:

providing existing specs for media elements;

displaying to a writer the existing specs for the media elements so that the writer can locate a desired media element;

when the writer locates a desired media element based on review of the existing specs, inserting a unique identifier for the located media element into the web page;

when the writer does not locate a desired media element based on review of the existing specs, creating a spec describing the desired media element as indicated by the writer and storing the created spec in association with the web page so that an artist can subsequently retrieve and use the spec to create the desired media element for the web page; and

after the artist has created the desired media element and when the writer selects to update the web page, inserting a unique identifier for the created media element into the web page.

23.   (Previously presented) The method of claim 22 including attaching a screen shot of the desired media element to the spec.

24.   (Previously presented) The method of claim 22 including continuing to create the web page after the spec is created or the unique identifier is inserted.

25.   (Previously presented) The method of claim 22 including updating a created spec.

26.   (Previously presented) The method of claim 22 wherein the writer and the artist are the same person.

27.   (Previously presented) The method of claim 22 including generating a report of unfulfilled specs for which an artist has not created the desired media element.

28.   (Previously presented) A computer-readable medium containing instructions for controlling a computer system to create a web page, by a method comprising:

   displaying to a writer existing specs for media elements so that the writer can locate a desired media element to add to the web page;

   when the writer locates a desired media element, inserting a unique identifier for the located media element into the web page;

   when the writer does not locate a desired media element, creating a spec describing the desired media element and storing the created spec in association with the web page so that an artist can subsequently retrieve and use the spec to create the desired media element for the web page; and

   after the artist has created the desired media element, inserting a unique identifier for the created media element into the web page.

29.   (Previously presented) The computer-readable medium of claim 28 wherein the unique identifier for the created media element is inserted into the web page when the writer indicates to update the web page.

30.   (Previously presented) The computer-readable medium of claim 28 including attaching a screen shot of the desired media element to the created spec.

31.   (Previously presented) The computer-readable medium of claim 28 including continuing to create the web page after the spec is created or the unique identifier is inserted.

32.   (Previously presented) The computer-readable medium of claim 28 including updating the created spec.

33.   (Previously presented) The computer-readable medium of claim 28 wherein the writer and the artist are the same person.

34.   (Previously presented) The computer-readable medium of claim 28 including generating a report of unfulfilled specs for which an artist has not created the desired media element.

35.   (Previously presented) The computer-readable medium of claim 28 including notifying the writer of a spec for which a desired media element has been created.

36.   (Previously presented) A computer system for creating a web page, comprising:

a component that provides existing specs for media elements so that a writer can locate a desired media element to add to the web page;

a component that inserts a unique identifier for the located media element into the web page when the writer locates a desired media element;

a component that, when the writer does not locate a desired media element, creates a spec describing the desired media element that includes a screen shot and storing the created spec in association with the web page;

a component that generates a report of unfulfilled specs for which an artist has not created the desired media element so that the artist can retrieve and use the spec to create the desired media element for the web page;

a component that notifies the writer when the desired media element has been created; and

a component that inserts a unique identifier for the created media element into the web page when requested by the writer.

APPENDIX B

No evidence pursuant to §§ 1.130, 1.131, or 1.132 or entered by or relied upon by the Examiner is submitted.

APPENDIX C

No related proceedings are referenced in II. above.